

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT
BUREAU OF WASTE MANAGEMENT

REC'D

DEC 17 2002

RESP

HAZARDOUS WASTE T/S/D FACILITY
COMPLIANCE INSPECTION CHECKLIST

(NOTE: Permit conditions take precedence over requirements set forth in this checklist.)

General

EPA ID KSD 007 246 846 Time 09:10 AM Date June 12 & 13, 02
Facility Name Safety Kleen (Wichita), Inc District SCDO
Street 2549 N. New York City Wichita Kansas Zip 67219
Mailing Address (if different than above) _____
County Sedgwick Phone 316 269-7400
Contact(s) Russell J. Dunn, Facility Manager
Inspector(s) Debbie Travis, Steff Fackrell, SCDO & Akhter Hossain, Topeka SIC: _____
Type of Business H.W. vendor & broker Number of Employees 29
Has the company declared any information/process as trade secrets (KSA 65-3447)? NO
If yes, explain: _____

Activity at Site

Treatment

☐ Chem/Phys/Bio Treatment ☐ Incineration ☐ Thermal Treatment
☐ Containment Building ☐ Recycling/Recovery ☐ Volume Reduction
☐ Filtration ☐ Reprocessing ☐ Other _____

Storage

☐ Containment Building ☐ Surface Impoundment ☒ Other BULK
☒ Drums ☒ Tank(s) (complete applicable checklist)
☐ Pile

Disposal

☐ Deep Well Injection ☐ Landfill ☐ Surface Impoundment
☐ Incineration ☐ Land Treatment ☐ Other _____

Comments:

Currently the site is a storage facility.



R00406628

RCRA RECORDS CENTER

Waste Analysis Plan (DGS)

- | | YES | NO | NA |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|-----|-----|
| 1 Does facility maintain a copy of its waste analysis plan at the facility?
[264.13(b)/265.13(b)] | [X] | [] | [] |
| a. If yes, does the plan include: | | | |
| A. Parameters for which each hazardous waste will be analyzed and rationale for the selection of these parameters? [(264.13(b)(1)/265.13(b)(1))] | [X] | [] | |
| B. Test methods which are used to test for these parameters?
[264.13(b)(2)/265.13(b)(2)] | [X] | [] | |
| C. Sampling method used to obtain sample? [264.13(b)(3)/265.13(b)(3)] | [X] | [] | |
| D. Frequency with which the initial analysis will be reviewed or repeated to ensure the analysis is current? [264.13(b)(4)/265.13(b)(4)] | [X] | [] | |
| E. For off-site facilities, the waste analyses that generators have agreed to supply? [264.13(b)(5)/265.13(b)(5)] | [X] | [] | [] |
| F. For off-site facilities, the procedures which are used to inspect and analyze each movement of hazardous waste received to ensure that it matches the identify of the waste designated on the manifest?
[264.13(c)/265.13(c)] | [X] | [] | [] |

Waste Analysis Plan Requirements:

[X] Compliance

[] Non-Compliance

[] N/A

Security (DGS)

- | | | | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|-------|-----|
| 2 Does the facility consider itself exempt from the security requirements as provided in 264.14(a)(1)&(2)/265.14(a)(1)&(2)? | [] | [X] | |
| If no, | | | |
| a. Does the facility provide either of the following: | | | |
| A. A 24-hour surveillance system (TV monitoring or guards)?
[264.14(b)(1)/265.14(b)(1)]; OR | [X] | [] | [] |
| B. An artificial or natural barrier (fence, fence and cliff combination) and a means to control entry (attendant, TV monitoring, locked entrance, controlled roadway access)? [264.14(b)(2)/265.14(b)(2)] | [X] | [] | [] |
| b. Has the facility posted warning signs at each entrance to the active portion of the facility, and at other locations, in sufficient numbers to be seen from any approach to the active portion? [264.14(c)/265.14(c)] | [X] | [] | |

Security Requirements:

[X] Compliance

[] Non-Compliance

[] N/A

General Inspection Requirements (DGS)

- | | | | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|-------|---------|
| 3 Does the owner/operator follow a written schedule at the facility for inspecting monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment? [264.15(b)(1)/265.15(b)(1)] | [X] | [] | |
| 4 Does the owner/operator keep the written inspection schedule at the facility?
[264.15(b)(2)/265.15(b)(2)] | [] | [X] | Viol. 8 |
| 5 Does the written inspection schedule identify the types of problems which are to be looked for during the inspections? [264.15(b)(3)/265.15(b)(3)] | [X] | [] | |
| 6 Does the owner/operator remedy any deterioration or malfunction of equipment or structures noted during the inspection? [264.15(c)/265.15(c)] | [] | [X] | Viol. 7 |

- 7 Does the owner/operator record inspections in an inspection log or summary which contains the date and time of inspection, name of inspector, notation of observations, and the date and nature of remedial action? [264.15(d)/265.15(d)] ☐ ☒ Viol. 7

Inspection Requirements: ☐ Compliance ☒ Non-Compliance ☐ N/A

Personnel Training (DGS)

- 8 Does the owner/operator maintain, at the facility, the following documents and records: [264.16/265.16]
- a. Job title for each position related to hazardous waste management and the name of the employee filling each job? [264.16(d)(1)/265.16(d)(1)] ☒ ☐
 - b. Written job description for each position? [264.16(d)(2)/265.16(d)(2)] ☒ ☐
 - c. Written description of type and amount of training to be given each person? [264.16(d)(3)/265.16(d)(3)] ☒ ☐
 - d. Records of training given to facility personnel? [264.16(d)(4)/265.16(d)(4)] ☒ ☐

Personnel Training Requirements: ☒ Compliance ☐ Non-Compliance ☐ N/A

Requirements for Ignitable, Reactive, or Incompatible Wastes (DGS)

- 9 Does the facility handle ignitable or reactive wastes? [264.17(a)/265.17(a)] ☒ ☐
- If yes,
- a. Is the waste separated and confined from sources of ignition or reaction, sparks, spontaneous ignition and radiant heat? [264.17(a)/265.17(a)] ☒ ☐
 - b. Are smoking and open flames confined to specially designated locations? [264.17(a)/265.17(a)] ☒ ☐
 - c. Are "No Smoking" signs posted in hazard areas? [264.17(a)/265.17(a)] ☒ ☐
 - d. Does a check of the areas used to handle ignitable or reactive wastes show:
 - A. Evidence of heat generation from interaction of incompatible wastes? [264.17(b)(1)/265.17(b)(1)] ☐ ☒
 - B. Evidence of uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health or the environment? [264.17(b)(2)/265.17(b)(2)] ☐ ☒
 - C. Evidence of uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion? [264.17(b)(3)/265.17(b)(3)] ☐ ☒
 - D. Evidence of any leakage from or corrosion of containers? [264.17(b)(4)/265.17(b)(4)] ☐ ☒
- 10 For permitted facilities only, when required to comply with paragraph (a) or (b) of 264.17/265.17, has the owner/operator documented that compliance? [264.17(c)] ☐ ☐ ☒

Ignitable, Reactive, or Incompatible Waste

Contingency Plan Requirements: ☒ Compliance ☐ Non-Compliance ☐ N/A

Preparedness and Prevention (DPP)

- 11 Does an inspection of the facility show any evidence of fire, explosion, or contamination? [264.31/265.31] ☒ ☐

YES NO NA

12 If applicable to the facility, is the facility equipped with:

- a. Internal communication or alarm system easily accessible in case of emergency? [264.32(a)/265.32(a)] ☒ [X] ☐ [] ☐ []
- b. Telephone or hand-held two-way radio capable of summoning emergency response assistance from local police departments, fire departments, or State or local emergency response teams? [264.32(b)/265.32(b)] ☒ [X] ☐ [] ☐ []
- c. Portable fire extinguishers, fire control, spill control equipment, and decontamination equipment? [264.32(c)/265.32(c)] ☒ [X] ☐ [] ☐ []
- d. Water of adequate volume for hose streams, foam producing equipment, sprinklers, etc? [264.32(d)/265.32(d)] ☒ [X] ☐ [] ☐ []

13 Is the equipment (mentioned above) tested and maintained to ensure its proper operation? [264.33/265.33]

☒ [X] ☐ [] ☐ []

14 Whenever hazardous waste is being poured, mixed, spread, or otherwise handled:

- a. Do all personnel involved in the hazardous waste activity have immediate access to an internal alarm or emergency communication device, either directly or through visual or voice contact with another employee? [264.34(a)/265.34(a)] ☒ [X] ☐ [] ☐ []
- b. Does an employee who is alone on the premises while the facility is operating have immediate access to a device capable of summoning external emergency assistance? [264.34(b)/265.34(b)] ☒ [X] ☐ [] ☐ []

15 Does a check of the facility show sufficient aisle space to allow unobstructed movement of personnel and equipment? [264.35/265.35]

☒ [X] ☐ [] ☐ []

16 As appropriate for the type(s) of waste handled, has the owner/operator:

- a. Made arrangements with the local emergency authorities to familiarize them with the layout of the facility, properties of wastes handled and associated hazards, places where facility personnel normally work, entrances to roads inside the facility, and possible evacuation routes? [264.37(a)(1)/265.37(a)(1)] ☒ [X] ☐ [] ☐ []
- b. Designated one primary authority in areas where more than one police and fire department might respond? [264.37(a)(2)/265.37(a)(2)] ☒ [X] ☐ [] ☐ []
- c. Made agreements with state emergency response teams, emergency response contractors, and equipment suppliers? [264.37(a)(3)/265.37(a)(3)] ☒ [X] ☐ [] ☐ []
- d. Familiarized local hospitals, with the properties of hazardous waste(s) handled and types of injuries that could result from fires, explosions, or releases at the facility? [264.37(a)(4)/265.37(a)(4)] ☒ [X] ☐ [] ☐ []

17 In cases where state or local authorities decline to enter into such arrangements, is the refusal entered in the operating record? [264.37(b)/265.37(b)]

☐ [] ☐ [] ☒ [X]

Preparedness and Prevention

Requirements:

☒ [X] Compliance

☐ [] Non-Compliance

☐ [] N/A

Contingency Plan and Emergency Procedures (DCP)

18 Is a contingency plan maintained at the facility and have copies been provided to outside agencies that may be called upon to provide emergency services? [264.53(a)/265.53(a)]

☒ [X] ☐ []

a. If yes, does the plan:

- A. Describe emergency actions facility personnel must take to respond to fires, explosions, or releases of hazardous waste? [264.52(a)/265.52(a)]

☒ [X] ☐ []

YES NO NA

- B. Describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams? [264.52(c)/265.52(c)] [X] []
- C. List the name(s), home address(es), and phone number(s) of designated emergency coordinator(s) in the order in which they should be contacted? [264.52(d)/265.52(d)] [X] []
- D. Include a list of all emergency equipment at the facility, its location, a physical description of each item on the list, and a brief outline of its capabilities? [264.52(e)/265.52(e)] [X] []
- E. Include an evacuation plan for facility personnel that describes signals and evacuation routes? [264.52(f)/265.52(f)] [X] []
- 19 Is an emergency coordinator available at all times? [264.55/265.55] [X] []
- 20 Has implementation of the plan been required at the facility? [] [X]
- a. If yes, was the facility required to submit a written report on the incident to the KDHE? [] []
- A. If yes, was the written report submitted? [264.56(j)/265.56(j)] [] []

Contingency Plan and Emergency Procedures Requirements:

[X] Compliance [] Non-Compliance [] N/A

Manifest System, Recordkeeping, and Reporting (DMR)

- 21 Does the facility receive waste from off-site? [264.71/265.71] [X] []
- a. If yes, does the owner/operator:
- A. Sign and date each copy of the manifest? [264.71(a)(1)/265.71(a)(1)] [X] []
- B. Note any significant discrepancies in the manifest on each copy of the manifest? [264.71(a)(2)/265.71(a)(2)] [X] []
- C. Give a signed copy to the transporter? [264.71(a)(3)/265.71(a)(3)] [X] []
- D. Send a signed copy of the manifest to the generator within 30 days of the delivery? [264.71(a)(4)/265.71(a)(4)] [X] []
- E. Retain a copy of the manifest for at least three years from the date of delivery? [264.71(a)(5)/265.71(a)(5)] [X] []
- 22 Does the facility receive any waste from a rail or water (bulk shipment transporter)? [] [X]
- a. If yes, is the shipment accompanied by a manifest or shipping paper containing the appropriate information? [264.71(b)/265.71(b)] [] []
- If yes, does the owner/operator:
- A. Does the owner/operator sign and date the shipping paper? [264.71(b)/265.71(b)] [] []
- B. Note any significant discrepancies in the shipping paper? [264.71(b)(2)/265.71(b)(2)] [] []
- C. Immediately give the rail or water transporter at least one copy of the shipping paper? [264.71(b)(3)/265.71(b)(3)] [] []
- D. Send a signed copy of the shipping paper to the generator within 30 days of the delivery? [264.71(b)(4)/265.71(b)(4)] [] []
- C. Retain a copy of the shipping paper? [264.71(b)(5)/265.71(b)(5)] [] []
- 23 Has the facility received any shipments of waste that were inconsistent with the manifest? [264.72/265.72] [X] []
- a. If yes, was an attempt made to reconcile the discrepancy with the generator and transporter? [264.72(b)/265.72(b)] [X] []

	YES	NO	NA
A. If the discrepancy was not reconciled within 15 days, did the owner/operator immediately notify the KDHE? [264.72(b)/265.72(b)]	[X]	[]	
24 Does the owner/operator keep a written operating record at the facility? [264.73(a)/265.73(a)]	[X]	[]	
a. If yes, does the operating record include:			
A. A description and the quantity of each hazardous waste received, and method(s) and date(s) of its treatment, storage, and disposal? [264.73(b)(1)/265.73(b)(1)]	[X]	[]	
B. The location of each hazardous waste within the facility and the quantity at each location? [264.73(b)(2)/265.73(b)(2)]	[X]	[]	
C. Records and results of waste analyses and waste determinations? [264.73(b)(3)/265.73(b)(3)]	[X]	[]	
D. Reports and details of incidents requiring implementation of the contingency plan? [264.73(b)(4)/265.73(b)(4)]	[X]	[]	
E. Records and results of required inspections? [264.73(b)(5)/265.73(b)(5)]	[X]	[]	
F. Monitoring, testing, or analytical data? [264.73(b)(6)/265.73(b)(6)]	[X]	[]	
G. Notices to generators that the facility has the appropriate permit(s) for and will accept the waste the generator is shipping? [264.73(b)(7)/265.73(b)(7)]	[X]	[]	
H. Closure cost estimates (and for disposal facilities, post-closure cost estimates)? [264.73(b)(8)/265.73(b)(8)]	[X]	[]	
I. Certification by the permittee, at least annually, that a hazardous waste minimization program is in place at the facility? [264.73(b)(9)/265.73(b)(9)]	[X]	[]	
J. As applicable, documentation that the Land Disposal Requirements have been met? [264.73(b)(10-16)/265.73(b)(10-16)]	[X]	[]	[]
25 Does the owner/operator prepare and submit a copy of a biennial report to the KDHE by March 1 of each even numbered year? [264.75/265.75]	[X]	[]	
a. If yes, does the report include:			
A. The EPA identification number, name, and address of the facility? [264.75(a)/265.75(a)]	[X]	[]	
B. The calendar year covered by the report? [264.75(b)/265.75(b)]	[X]	[]	
C. A description and the quantity of each hazardous waste received during the year? [264.75(d)/265.75(d)]	[X]	[]	
D. The method of treatment, storage, or disposal for each hazardous waste? [264.75(e)/265.75(e)]	[X]	[]	
E. The most recent cost estimate and, as applicable, the most recent post-closure cost estimate? [264.75(g)/265.75(g)]	[X]	[]	
b. If yes and the facility receives waste from off-site facilities, does the report include:			
A. The EPA identification number of each hazardous waste generator from which the facility received a hazardous waste during the year? [264.75(c)/265.75(c)]	[X]	[]	[]
B. A description and the quantity, listed by the EPA identification number of each generator, of each hazardous waste received during the year? [264.75(d)/265.75(d)]	[X]	[]	[]
c. If yes and the facility receives shipments from foreign generators, does the report include the name and address of the foreign generators?	[X]	[]	[]
d. If yes and the facility is also a generator who treats, stores, and/or disposes of hazardous waste on-site, does the report include a description of:			
A. The efforts undertaken during the year to reduce the volume and toxicity of waste generated? [264.75(h)/265.75(h)]	[X]	[]	[]
B. The changes in volume and toxicity of waste actually achieved during the year in comparison to previous years? [264.75(i)/265.75(i)]	[X]	[]	

YES NO NA

26 Has the facility accepted any waste not accompanied by a manifest or shipping papers?

[] [X]

a. If yes, was the shipment excluded from manifest/shipping paper requirements?

A. If no, did the facility submit an unmanifested waste report to the KDHE within 15 days? [264.76/265.76]

[] []

Manifest System, Recordkeeping and Reporting Requirements:

[X] Compliance

[] Non-Compliance

[] N/A

Closure and Post-Closure (DCL)

27 Does the owner/operator have a written closure plan for the facility?

[264.112(a)/265.112(a)]

[X] []

a. If yes, does the plan include:

A. A description of how and when the facility will be closed?

[265.112(b)/265.112(b)]

[X] []

B. A description of the steps necessary to completely close the facility?

[264.112(b)(2)/265.112(b)(2)]

[X] []

C. An estimate of the maximum inventory of wastes in storage or in treatment at any give time during the facility life? [264.112(b)(3)/265.112(b)(3)]

[X] []

D. A description of the steps needed to decontaminate facility equipment at the time of closure? [264.112.(b)(4)/265.112(b)(4)]

[X] []

E. A description of the activities necessary to ensure that all closure satisfy the closure performance standards? [265.112(b)(5)/265.112(b)(5)]

[X] []

F. An estimate of the expected year of closure and a schedule for final closure which includes the total time required to close the facility and the time required for intervening closure activities which allow tracking closure progress? [264.112(b)(6)/265.112(b)(6)]

[X] []

28 Is the facility a disposal facility?

[] [X]

a. If yes, does the owner/operator have a written post-closure plan?

[264.118(a)/265.118(a)]

[] []

If yes, does the plan include:

A. Ground-water monitoring activities and frequencies at which they will be performed? [264.118(c)(1)/265.118(c)(1)]

[] []

B. Maintenance activities and frequencies at which they will be performed to ensure the integrity of the cap and containment structures where applicable, and the function of the monitoring equipment?

[264.118(c)(2)/265.118(c)(2)]

[] []

C. The name, address, and phone number of the person or office to contact during the post-closure period? [264.118(c)(3)/265.118(c)(3)]

[] []

Closure and Post-closure Requirements:

[X] Compliance

[] Non-Compliance

[] N/A

Financial Requirements (DFR)

29 Does the owner/operator have a written estimate of the closure cost?

[264.142(a)/265.142(a)]

[X] []

30 Has the owner/operator established financial assurance for facility closure and notified the KDHE? [264.143/265.143]

[X] []

	YES	NO	NA
31 Is the facility a disposal facility?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
a. If yes, has the owner/operator:			
A. Established a written estimate of the annual cost of post-closure monitoring and maintenance of the facility? [264.144(a)/265.144(a)]	<input type="checkbox"/>	<input type="checkbox"/>	
B. Established financial assurance for post-closure care and notified the KDHE? [264.145/265.145]	<input type="checkbox"/>	<input type="checkbox"/>	
C. Obtained liability insurance for nonsudden and accident occurrences of at least \$3 million per occurrence with an annual aggregate of at least \$6 million exclusive of legal defense costs? [264.147(b)/265.147(b)]	<input type="checkbox"/>	<input type="checkbox"/>	
32 Has the owner/operator obtained liability insurance for sudden occurrences of at least \$1 million with an aggregate of at least \$2 million exclusive of legal defense costs? [264.147(a)/265.147(a)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

Financial Requirements:	<input checked="" type="checkbox"/> Compliance	<input type="checkbox"/> Non-Compliance	<input type="checkbox"/> N/A
Management of Containers (DMC)			

33 Are containers presently used to store hazardous waste?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
If yes,			
a. Are the containers in good condition? [264.171/265.171]	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Viol. 3
b. Are the containers compatible with the waste? [264.172/265.172]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
c. Are all containers holding hazardous waste closed during storage except when necessary to add or remove waste? [264.173/265.173]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
d. Does owner/operator inspect areas where containers are stored, at least weekly, for signs of leaking containers and for deterioration of the containers and containment system caused by corrosion or other factors? [264.174/265.174]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
e. Does the storage facility store waste containing free liquids which would require it to have a containment system? [264.174/265.174]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
If yes,			
A. Is the base free of cracks or gaps and sufficiently impervious to contain leaks, spills, and accumulated precipitation? [264.175(b)(1)/265.175(b)(1)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
B. Is the base sloped or the containment system otherwise designed and operated to drain and removed liquids? [264.175(b)(2)/265.175(b)(2)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
C. Does the containment system have sufficient capacity to contain 10% of the volume of containers or the volume of the largest container, whichever is greater? [264.175(b)(3)/265.175(b)(3)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
D. Is the containment system designed to prevent run-on or to have sufficient excess capacity in addition to that required in item C above? [264.175(b)(4)/265.175(b)(4)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
E. Are spilled or leaked waste and accumulated precipitation removed in a timely manner as necessary to prevent overflow of the system? [264.175(b)(5)/265.175(b)(5)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
f. Does the storage area store containers holding only wastes that do not contain free liquids?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
If yes,			
A. Are the containment system requirements of 264.175(b)/265.175(b) met?	<input type="checkbox"/>	<input type="checkbox"/>	
If no,			
i. Is the storage area sloped or otherwise designed and operated to drain and remove liquid resulting from precipitation? [264.175(c)(1)/265.175(c)(1)]; OR	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
ii. Are the containers elevated or otherwise protected from contact with accumulated liquid? [264.175(c)(2)/265.175(c)(2)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

YES NO NA

- g. Are containers holding ignitable or reactive waste located at least 50 feet from the facility's property line? [264.176/265.176]
- h. If waste in containers is incompatible with other materials stored nearby, in other containers, piles, open tanks, or surface impoundments, are the containers separated from other materials by means of a dike, berm, wall, or other device? [264.177(c)/265.177(c)]

[X] []

[X] []

Management of Containers	<input type="checkbox"/> Compliance	<input checked="" type="checkbox"/> Non-Compliance	<input type="checkbox"/> N/A
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TSDLIST: TSD Checklist Revised 9/98

Additional Information and Conclusions: